



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 BROADWAY

NEW YORK, NY 10007-1866

NOV 07 2016

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Article Number: 7015 3010 0001 6837 3762

Mr. Steve Locilento
Jersey Core Supply Inc.
635 Jackson Street
Camden, New Jersey 08105

RE: Request for Information ("RFI") Pursuant to Section 308 of the Clean Water Act
Compliance Evaluation Inspection Report for CEI conducted on April 4, 2016 at
Jersey Core Supply, Inc.
Docket No. CWA-IR-17-007

Dear Mr. Locilento:

The United States Environmental Protection Agency ("EPA") is charged with the protection of human health and the environment under the Clean Water Act ("CWA" or "Act"), 33 U.S.C. §§ 1251 *et seq.* Section 308(a) of the CWA, 33 U.S.C. § 1318(a), provides that whenever it is necessary to carry out the objectives of the CWA, including determining whether or not a person/agency is in violation of Section 301 of the CWA, 33 U.S.C. § 1311, the EPA shall require the submission of any information reasonably necessary to make such a determination. Under the authority of Section 308 of the CWA, EPA may require the submission of information necessary to assess the compliance status of any facility and its related appurtenances.

Jersey Core Supply Inc. is hereby required, pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a), to submit to EPA documentation with accompanying photographs of the following no later than deadlines specified:

1. No later than thirty (30) calendar days of receipt of this RFI, submit documentation with accompanying photographs of the measures taken to address the Potential Violation and each of the Areas of Concern specified in the enclosed Inspection Report
2. No later than thirty (30) calendar days of receipt of this RFI, submit the facility documentation that includes the Storm Water Pollution Prevention Plan ("SWPPP"), records of annual inspections, records of quarterly inspections, records of staff training to minimize operation activity exposure to Stormwater.

All information required to be submitted by this Request for Information shall be sent by certified mail or its equivalent to the following address:

Doughlas McKenna, Chief
Water Compliance Branch
Division of Enforcement and Compliance Assistance
290 Broadway, 20th Floor
New York, NY 10007-1866

Any documents to be submitted by Jersey Core Supply, Inc. must be sent by certified mail or its equivalent and shall be signed by an authorized representative of the respective entity (see 40 C.F.R. § 122.22), and shall include the following certification:

“I certify under penalty of law that this document and all enclosures were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitted false information, including the possibility of fine and imprisonment for knowing violations.”

Failure to provide the required information may subject the facility to civil/criminal penalties pursuant to Section 309 of the CWA. Failure to comply with the RFI shall also subject the facility to ineligibility for participation in work associated with Federal contracts, grants or loans.

Enclosed is a copy of the inspection report detailing EPA's findings from the inspection April 4, 2016 at Jersey Core Supply, Inc.

If you have any questions regarding this Request for Information or the enclosed Inspection Report, please feel free to contact Cyndy Kopitsky of my staff via phone at (212) 637-3832 or via email at kopitsky.cyndy@epa.gov.

Sincerely,



Doughlas McKenna, Chief
Water Compliance Branch

Enclosure

cc: Marcedius Jameson, Administrator, Water and Land Use Enforcement, NJDEP
(w/enclosures)

Section A: National Data System Coding (i.e., PCS)

Transaction Code		NPDES										yr/mo/day				Inspection Type			Inspector		Fac Type							
1	N	2	5	3	N	J	0	1	5	5	2	3	3	11	12	1	6	0	4	0	4	17	18	C	19	R	20	2

Remarks

[illegible]

Section B: Facility Data



Name and Location of Facility Inspected (for industrial users discharging to POTW, also include POTW name and NPDES permit number)										Entry Times/Dates		Permit Effective Date	
Jersey Core Supply Inc. 635 Jackson Street Camden, New Jersey 08105 NJG0155233										8:15 AM		10/01/2012	
										Exit Times/Dates		Permit Expiration Date	
										9:35 PM		09/30/2017	
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)										Other Facility Data			
Mr. Steve Locilento, Owner 856-365-2020										SIC Code: 3714: Motor Vehicle Parts and Accessories Lat. 39.925215, Long. -75.117214			
Name, Address of Responsible Official/Title/Phone and Fax Number(s)													
Mr. Steve Locilento, Owner 635 Jackson Street Camden, NJ 08105 856-365-2020													

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

X	Permit	Flow Measurement	x	Operations & Maintenance	CSO/SSO (Sewer Overflow)
X	Records/Reports	Self-Monitoring Program		Sludge Handling/Disposal	Pollution Prevention
X	Facility Site Review	Compliance Schedules		Pretreatment	Multimedia
	Effluent/Receiving Water	Laboratory	X	Storm Water	Other:

Section D: Summary of Findings/Comments (Attach additional sheets of narrative and checklists as necessary)

See attached report.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
 Cyndy S. Kopitsky, Physical Scientist	EPA/DECA-WCB/(212) 637-3832 FAX:x3953	10.27.16
Signature of Management Q/A Reviewer	Agency/Office/Phone and Fax Numbers	Date
 Justine Modigliani, Chief, Compliance Section	EPA/DECA-WCB/(212) 637-4268/FAX:x3953	10/13/16

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2, DECA-WCB
20th Floor, 290 Broadway, New York, NY 10007

COMPLIANCE EVALUATION INSPECTION REPORT

Compliance Evaluation Inspection: Jersey Core Supply Inc.
Inspection Date: April 4, 2016 Inspection Time: 8:15AM – 9:35PM
EPA Inspector: Cyndy S. Kopitsky, Environmental Scientist, USEPA Region 2, DECA, Water Compliance Branch (212) 637-3832 & Andrew Dinsmore, Stormwater Team Leader USEPA Region 3 (215) 814-2788
NJDEP Representative: Sandy Crowley, 609-439-9537
On-Site Representative: Mr. Steve Locilento, 856-365-2020
Site Information: Jersey Core Supply Inc. 635 Jackson Street Camden, New Jersey 08105 Owner/Operator/Permittee: Jersey Core Supply Inc. 635 Jackson Street Camden, New Jersey 08105 Lat. 39.925215, Long. -75.117214 SPDES No. NJG0155233

INTRODUCTION

On April 4, 2016, the United States Environmental Protection Agency (“EPA”) conducted a Compliance Evaluation Inspection (“CEI”) at Jersey Core Supply Co. Inc., located at 1999 Cooper Street, Camden, New Jersey (the “Site” or “Facility”) to determine compliance with the Master Vehicle Recycling General Stormwater Permit Multi-Sector General Permit (RVR) for Stormwater Discharges Associated with Industrial Activity. The facility maintains coverage under the New Jersey State Vehicle Recycling Industrial Stormwater General Permit Multi-Sector General Permit No. NJG0155233. The effective date of the Permit was 10-01-12 and expires 9-30-17. The Facility conducts industrial activity under Standard Industrial Classification (“SIC”) Code 3714: Motor Vehicle Parts and Accessories.

Defined in Part 2.2 of the Camden NJ Wastewater Operations and Maintenance Plan August 2015, the wastewater collection system is primarily combined and a majority of the wastewater and a portion of the stormwater is conveyed to the Camden County Municipal Utilities Authority (CCMUA).

At the time of the inspection the EPA inspectors were informed that:

- This facility is shut down temporarily as of February 26, 2016
- Trucking and exporting were the facilities primary operation

At the time of the inspection, the owner, Mr. Steve Locilento was on site.

At the time of the inspection, EPA inspectors noted that there were several large fuel tanks and a one thousand gallon diesel tank on site. There were several drums/containers with used oil that were in storage. EPA inspectors were informed that the owner was going to contact Camden Iron Waste Hauler, to have the material removed.

At the time of the inspection there was standing water in the loading dock area. This water had an oily sheen on the surface. There was a large sediment collection in the loading dock area.

At the time of the inspection the Stormwater Pollution Prevention Plan ("SPPP") was not available for review.

At the time of the inspection there were engines being stored in the warehouse.

At the time of the inspection, there were oil stains on the ground as seen in photos DSCN6982, DSCN6984, DSCN6988. There were additional locations where oil had spilled or leaked and speedy-dry was used as seen in photos DSCN6986, DSCN6989.

At the time of the inspection, there was uncontained rusty scrap metal and parts in the back of the property as seen in photo DSCN7000.

POTENTIAL NONCOMPLIANCE

As required by Part IV.B.1.a. and 2.a. of the permit, the permittee shall develop, implement, update and maintain a SPPP. The objective of the SPPP is to identify potential sources of pollution and source materials onsite; and document the practices utilized to minimize and/or eliminate the exposure of pollutant sources to stormwater. The SPPP shall be signed by a representative of the facility, and the original shall be retained at the facility for use by the facility and inspection by the Department. At the time of the inspection, the SPPP was not available for review therefore in violation of Part IV.B.1.a. and 2.a. of the permit.

As required by Part IV.B.4.a-d. of the permit, the SPPP shall identify the Best Management Practices ("BMP's") that are in place to eliminate, reduce or minimize exposure of industrial activity and source material to stormwater that discharges to surface water or groundwater. The SPPP shall address all BMPs identified in Part IV C. and can also include a description of proposed BMPs. The SPPP shall contain a site map and an inventory of source materials. At the time of the inspection there was no site map or identified BMP's in place therefore in violation of Part IV.B.4.a-d. of the permit.

As required by part IV.4.f. of the permit, the SPPP shall establish a regular schedule for inspections to verify that the BMPs are being implemented. Inspections shall be conducted on a quarterly basis, at a minimum. An inspection log shall be maintained in the SPPP and shall consist of the following information: 1) Date and time of inspection; 2) Verification that all BMPs are in place; 3) Any failures or breakdowns of BMPs including structural BMPs; 4) Any identified problems and their location (e.g. incidents such as leaks and accidental discharges); 5) Steps taken to correct any failures or problems as well as steps to prevent recurrence; and 6) Name and title of facility personnel performing the inspection. At the time of the inspection, there were no inspection records available therefore in violation of IV.B.4.f. of the permit.

As required by IV.B.5.a-e, the permittee shall conduct annual inspections of the facility in accordance with N.J.A.C. 7:14A-24.9(a) to assess all areas contributing to the stormwater discharge authorized by the permit, to evaluate whether the SPPP complies with and is implemented in accordance with the permit, and to determine whether additional measures are needed to meet the conditions of the permit.

Additionally, the permittee shall prepare an annual report by October 1 of each year. The permittee shall complete an annual certification that the facility has completed their annual report and is in compliance with the SPPP and the permit. Annual reports and certifications shall be retained by the permittee with the SPPP for a period of at least five (5) years. At the time of the inspection there were no records of annual inspections or annual reports available therefore in violation of IV.B.5.a-e of the permit.

As required by IV.C.5.a-d., all drained fluid shall be stored in a designated fluid storage area. This area shall be either: 1) indoors, or 2) on an impervious surface (e.g. concrete pad) that is contained (e.g. bermed) and under cover. A dedicated spill kit shall be kept in this area. All drained fluid shall be placed in leak-proof containers with secondary containment and shall be labeled for easy identification of contents. At the time of the inspection, vehicle fluids were stored in various containers and placed directly on the ground uncovered, there was no secondary containment for the fuel tanks, and there was oil on the ground around the oil containers therefore in violation of IV.C.5.a-d. of the permit as seen in photo DSCN6976.

As required in part IV.C.9.a. of the permit, all impervious surfaces and bermed areas shall be regularly maintained and kept free of fluids. At the time of the inspection, there was a collection of water and sediment in the loading dock area in the rear of the facility with an oily sheen on the surface therefore in violation of part IV.C.9.a. of the permit as seen in photos DSCN6994, DSCN6996, DSCN6997.

AREAS OF CONCERN

1. At the time of the inspection EPA inspectors observed a dumpster on the site that was uncovered and exposed to stormwater as seen in photos DSCN6995, DSCN6997, DSCN6998.
2. At the time of the inspection EPA inspectors observed open oil containers in the storage area as seen in photo DSCN6985.
3. At the time of the inspection EPA inspectors observed rusty metal parts and scrap materials on the property and exposed to stormwater as seen in photo DSCN7000.

CLOSING

A closing conference was held with Mr. Steve Locilento explaining the findings of the inspection. Any additional questions were answered at that time.

ATTACHMENTS

Photographs

Attachment 1 - Photograph Log: Jersey Core Supply Co. Inc. 635 Jackson Street Camden, New Jersey. Unedited photographs taken on April 4, 2016 by Cyndy S. Kopitsky, Physical Scientist, DECA-WCB, USEPA Region 2 with Coolpix 100 EPA Camera.

DSCN6976	Storage Fuel Tank
DSCN6978	Cylinders Inside Storage area
DSCN6979	Cylinders Inside Storage area
DSCN6980	Equipment and part storage
DSCN6982	Storage under part coverage
DSCN6983	Storage under part coverage
DSCN6984	Leak fuel spill area
DSCN6985	Oil storage-uncovered buckets
DSCN6986	Spill-part speedy dry
DSCN6987	Inside storage
DSCN6988	Inside storage
DSCN6989	Inside storage
DSCN6990	Drum and engine part storage
DSCN6991	Fuel tank
DSCN6992	Auto parts
DSCN6994	Loading dock-rear of facility
DSCN6995	Rear of facility
DSCN6996	Loading dock
DSCN6997	Loading dock standing water
DSCN6998	Open dumpster
DSCN6999	Rear of facility
DSCN7000	Metal parts/scrap
DSCN7001	Rear of facility
DSCN7002	Surface oily staining/partial speedy dry
DSCN7003	Underground storage tank certificate
DSCN7004	2005 BMP form
DSCN7005	1999 Permit



DSCN6976



DSCN6978



DSCN6979



DSCN6980

4/4/2016

Jersey Core Supply Camden CEI NJG0155233



DSCN6982



DSCN6983



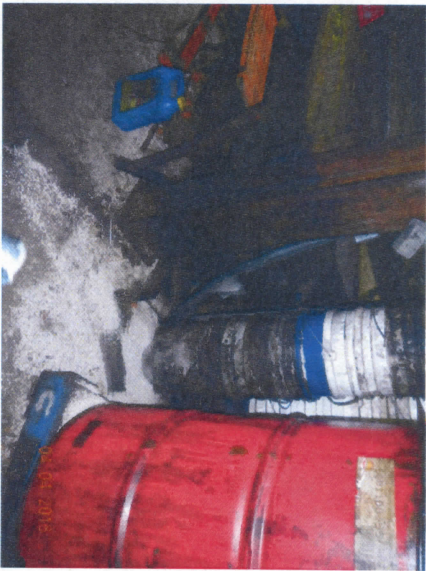
DSCN6984



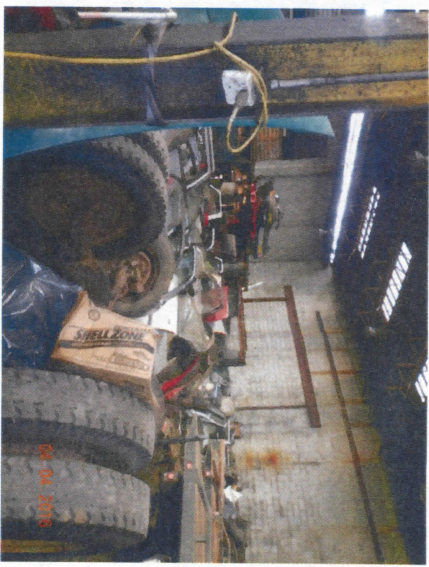
DSCN6985

4/4/2016

Jersey Core Supply Camden CEI NJG0155233



DSCN6986



DSCN6987



DSCN6988



DSCN6989

4/4/2016

Jersey Core Supply Camden CEI NJG0155233



DSCN6990



DSCN6991



DSCN6992



DSCN6994

4/4/2016

Jersey Core Supply Camden CEI NJG0155233



DSCN6995



DSCN6996



DSCN6997



DSCN6998

4/4/2016

Jersey Core Supply Camden CEI NJG0155233



DSCN6999



DSCN7000



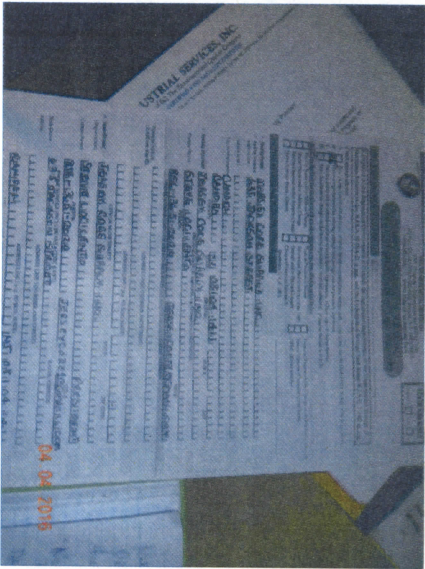
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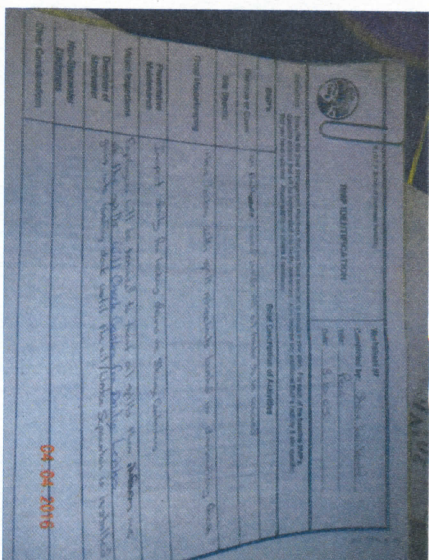
DSCN7002

4/4/2016

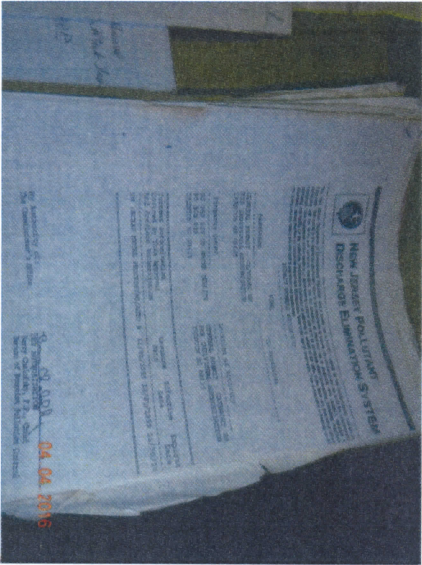
Jersey Core Supply Camden CEI NJG0155233



DSCN7003



DSCN7004



DSCN7005

4/4/2016

Jersey Core Supply Camden CEI NJG0155233